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Industrial and Service Workers International Union

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:)	Chapter 11
)	
Lexington Precision Corp., <i>et al.</i> ,)	Case No.: 08-11153 (MG)
)	(Jointly Administered)
Debtors.)	
)	Honorable Martin Glenn

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that pursuant to Rules 2002 and 9010(b) of the Rules of Bankruptcy Procedure, and 11 U.S.C. §1109(b), the undersigned attorney appears for the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (“USW”), a creditor and party in interest in this case, and requests that all notice given or required to be given in this action and all related actions, be given and served upon the following:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers, whether formal or informal, *ex parte* or on notice, written or oral, referred to in the Bankruptcy Rules and Code sections specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telecopier or otherwise, which affect or seek to affect in any way any rights or interests of the Debtors.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any later appearance, pleading, claim, or suit shall waive USW's right to have final orders in noncore matters entered only after *de novo* review by a District Judge; or the right to trial by jury in any proceeding related to this case; or the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or to adjudicate rights in other applicable forums, or any other rights, claims, actions, defenses, setoffs, or recoupments to which these entities are or may be entitled under agreements, in law or in equity, all of which rights are expressly reserved.

Dated: April 15, 2008

Respectfully submitted,

/s/ David R. Jury

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of April, 2008, I caused a true and correct copy of the foregoing Notice of Appearance and Request for Notice to be duly served upon on the parties listed below by email and first class mail, postage pre-paid:

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